

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**ASTELLAS INSTITUTE FOR
REGENERATIVE MEDICINE, and
STEM CELL & REGENERATIVE
MEDICINE INTERNATIONAL,
INC.,**

Plaintiffs,

v.

**IMSTEM BIOTECHNOLOGY,
INC., XIAOFANG WANG, and
REN-HE XU,**

Defendants.

Civil Action No. 1:17-cv-12239-ADB

Hon. Allison D. Burroughs

ASSENTED-TO MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Rule 26(C)(1) of the Federal Rules of Civil Procedure, the Plaintiffs' respectfully move for entry of the [Stipulated] Joint Protective Order (attached as Exhibit A). All parties to this action have conferred on this [Stipulated] Joint Protective Order and agree to its terms.

Dated: April 22, 2019

Respectfully submitted,

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*Counsel for Plaintiff Stem Cell & Regenerative
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LOCAL RULE 7.1 CERTIFICATION

I, Charles Sanders, counsel for Astellas, hereby certify that counsel for Plaintiffs and Defendants have conferred on the issues presented in and resolved the issues regarding the [Stipulated] Protective Order.

Date: April 22, 2019

/s/ Charles H. Sanders
Charles H. Sanders (BBO 646740)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Date: April 22, 2019

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